

## **Workforce Services Policy – Pre-Apprenticeship**

---

### **Executive Summary**

**1. What is the general purpose of this policy?**

This policy establishes a framework, consistent with federal guidance, to certify pre-apprenticeships and have a facilitated entry and/or articulation agreement in place with a Registered Apprenticeship Program (RAP) or Industry Recognized Apprenticeship Program (IRAP). This certification process is being developed to prevent individuals from attending pre-apprenticeship programs that do not follow federal guidance and do not lead to a RAP, IRAP, or sustainable employment.

**2. What are the notable guidelines conveyed within this policy?**

The Apprenticeship Office (AO) will vet pre-apprenticeships, and if aligned with TEN 13-12, the state will issue a certification to the training provider. This is a Tennessee developed process and the certified pre-apprenticeship programs will only be certified for the State of Tennessee.

**3. What must the Local Workforce Development Board do to meet the requirements of this policy?**

There is no requirement for the Local Workforce Board; all vetted and certifications will be awarded through the Workforces Service's Apprenticeship Office.

**4. How does this policy affect the workforce system?**

Strengthens pre-apprenticeship programs to create a direct talent pipeline into a Registered Apprenticeship Program.



STATE OF TENNESSEE  
**State Workforce Development Board**

220 French Landing Drive, 4A  
Nashville, TN 37243-1002  
(615) 741-0409

**Workforce Services Policy- Pre-Apprenticeship**

**Effective Date:** November 13, 2020

**Duration:** June 30, 2022

**Purpose:**

This policy establishes a framework, consistent with federal guidance<sup>1</sup>, to certify pre-apprenticeships and have a facilitated entry and/or articulation agreement in place with a Registered Apprenticeship Program (RAP) or Industry Recognized Apprenticeship Program (IRAP). This certification process is being developed to prevent individuals from attending pre-apprenticeship programs that do not follow federal guidance and do not lead to a RAP, IRAP, or sustainable employment.

**Scope:**

Office of the Governor, Tennessee Department of Labor and Workforce Development (TDLWD); Division of Workforce Services (WFS); Tennessee Department of Economic and Community Development (ECD); Tennessee Department of Education (TDOE); Tennessee Department of Human Services (DHS); State Workforce Development Board (SWDB); Title I – Adult, Dislocated Worker, and Youth Programs, Title II – Adult Education and Family Literacy Act Program(AE); Title III – Wagner-Peyser Act Program (WP); Title IV – Vocational Rehabilitation Program (VR); Regional Planning Council (RPC); Local Workforce Development Boards (LWDB); Local Workforce Development Areas (LWDA); American Job Center (AJC); One-Stop Operator (OSO); Workforce System Sub-Recipients (Sub-Recipients); Workforce System Partners (Partners)

**I. Framework for a Certified Pre-Apprenticeship Programs**

All Pre-Apprenticeship programs that are certified by the Tennessee Department of Labor's (TDLWD) Apprenticeship Office (AO) will include the elements of a quality pre-apprenticeship program. The elements that define a quality pre-apprenticeship are:

- Approved training curriculum
- Strategies for long-term success
- Access to appropriate support services

---

<sup>1</sup> TEN 13-12

- Promotes greater use of RAPs and IRAPs to increase future opportunities
- Meaningful hands-on training that does not displace paid employees
- Facilitated entry and/or articulation

Once a Pre-Apprenticeship program meets the certification standards, as established in section II, it will be displayed on the ApprenticeshipTN website and the RAPs with which they have articulation agreements.

## **II. Responsibilities for Certification**

### **A. Application for Certification**

All programs wishing to become certified must submit applications to the State's AO. The application will be posted on the ApprenticeshipTN website and will contain the following required fields:

- Organization name
- Program manager contact information (name, phone, email)
- Detailed training curriculum
- Access to appropriate support services
- Strategies for long-term success
- Meaningful hands-on training that does not displace paid Employees
- Facilitated Entry and/or articulation agreements with Registered Apprenticeship Programs.

### **B. Certification Process**

The State's AO will review each application and determine if all required Pre-Apprenticeship elements are established.

1. If the requirements are met, State Certification will be awarded to the entity applying.
  - i. All Pre-Apprenticeship programs will be required to provide information on apprentices for tracking purposes to the AO
  - ii. Required notification, by email, to [Apprenticeship.tn@tn.gov](mailto:Apprenticeship.tn@tn.gov) for any additional employer articulation agreements within 30 days of the agreement date.
2. If the requirements are not met, the entity will be notified of incomplete information and be provided a deadline for submission. If the information is not received by the deadline, then the application will be denied. Justification for denial will be documented and shared with the applying entity.

## **III. Monitoring Process**

To maintain an effective and compliant Pre-Apprenticeship Program, the AO will conduct monitoring on an annual basis, at a minimum. This monitoring will allow the AO to identify potential compliance issues, track progress on completers, and track hiring rates. The annual monitoring will include issuing an annual notification with a questionnaire. This questionnaire will allow the Certified Pre-Apprenticeship program to provide any curriculum changes and the reason for the changes. The notification will also serve as an "Intent to Continue" as a Certified Pre-Apprenticeship program, and all certified programs will be required to respond to an annual reporting questionnaire. All notifications and submission of questionnaires will be conducted through email, [Apprenticeship.tn@tn.gov](mailto:Apprenticeship.tn@tn.gov).

#### **IV. Report Process**

To maintain an effective and compliant Pre-Apprenticeship program, the AO will produce quarterly measures on the numbers of pre-apprentices enrolled in Certified Pre-Apprenticeship programs and hiring rates. Pre-apprentices will be cross-referenced with apprentice data in the U. S. Department of Labor system to verify hires into RAPs and IRAPs.

The State's AO will verify the information entered in the state and the U. S. Department of Labor systems for the individual apprentices and pre-apprentices where applicable. Failure to provide notices, as requested, submit annual questionnaire responses, or provide pre-apprentice information to the AO will result in loss of certification status.

#### **References:**

TEN 13-12

#### **Contact:**

For any questions related to this policy, please contact the Program Integrity Unit at [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov).

---

Tim Berry, State Workforce Development Board Chair